

BOIES SCHILLER FLEXNER LLP

Mark C. Mao (CA Bar No. 236165)
mmao@bsflfp.com
Beko Reblitz-Richardson (CA Bar No. 238027)
brichardson@bsflfp.com
44 Montgomery Street, 41st Floor
San Francisco, CA 94104
Tel: (415) 293 6858
Fax: (415) 999 9695

SUSMAN GODFREY L.L.P.

William Christopher Carmody (pro hac vice)
bcarmody@susmangodfrey.com
Shawn J. Rabin (pro hac vice)
srabin@susmangodfrey.com
1301 Avenue of the Americas, 32nd Floor
New York, NY 10019
Telephone: (212) 336-8330

MORGAN & MORGAN

John A. Yanchunis (pro hac vice)
jyanchunis@forthepeople.com
Ryan J. McGee (pro hac vice)
rmcgee@forthepeople.com
201 N. Franklin Street, 7th Floor
Tampa, FL 33602
Telephone: (813) 223-5505

*Counsel for Plaintiffs; additional counsel
listed in signature blocks below*

**QUINN EMANUEL URQUHART &
SULLIVAN, LLP**

Andrew H. Schapiro (admitted *pro hac vice*)
andrewschapiro@quinnemanuel.com
191 N. Wacker Drive, Suite 2700
Chicago, IL 60606
Tel: (312) 705-7400
Fax: (312) 705-7401

Stephen A. Broome (CA Bar No. 314605)
stephenbroome@quinnemanuel.com
Viola Trebicka (CA Bar No. 269526)
violatrebicka@quinnemanuel.com
865 S. Figueroa Street, 10th Floor
Los Angeles, CA 90017
Tel: (213) 443-3000
Fax: (213) 443-3100

Diane M. Doolittle (CA Bar No. 142046)
dianedoolittle@quinnemanuel.com
555 Twin Dolphin Drive, 5th Floor
Redwood Shores, CA 94065
Telephone: (650) 801-5000
Facsimile: (650) 801-5100

*Counsel for Defendant; additional counsel
listed in signature blocks below*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

CHASOM BROWN, MONIQUE
TRUJILLO, WILLIAM BYATT, JEREMY
DAVIS, and CHRISTOPHER CASTILLO,
individually and on behalf of all similarly
situated,

Plaintiffs,

v.

GOOGLE LLC,
Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**JOINT STIPULATION AND [PROPOSED]
ORDER EXTENDING TIME FOR
SUBMITTING DECLARATIONS IN
SUPPORT OF SEALING (DKTS. 660, 671)
AND RESPONDING TO PLAINTIFFS'
ADMINISTRATIVE MOTION (DKT. 672)**

The Honorable Susan van Keulen

1 Pursuant to Civil Local Rule 6-2 and 7-12, this joint stipulation is entered into between
2 Plaintiffs and Google LLC (“Google”), collectively referred to as the “Parties.”

3 **Google’s Motion to Seal (Dkt. 660)**

4 WHEREAS, on August 5, 2022, Google filed its Administrative Motion to Consider
5 Whether Another Party’s Material Should Be Sealed (“Google’s Motion to Seal”) (Dkt. 660);

6 WHEREAS, on August 5, 2022, Plaintiffs received unredacted copies of Google’s Motion
7 to Seal and exhibits cited in Dkt. 666;

8 WHEREAS, pursuant to Civil Local Rule 79-5(e), the deadline for Plaintiffs, as the
9 Designating Party to portions of Google’s Motion to Seal (Dkt. 660), to establish that such
10 designated material is sealable, is Friday, August 12, 2022;

11 WHEREAS, Plaintiffs have requested, and Google does not oppose an extension of time of
12 14 days to Friday, August 26, 2022, which Plaintiffs have represented will provide them with
13 sufficient time to submit their declaration in support of the designated materials in the filings (Dkt.
14 660);

15 **Plaintiffs’ Motion to Seal (Dkt. 671)**

16 WHEREAS, on August 8, 2022, Plaintiffs filed their Administration Motion to Consider
17 Whether Google’s Material Should Be Sealed (“Plaintiffs’ Motion to Seal”) (Dkt. 671);

18 WHEREAS, on August 8, 2022, Google received unredacted copies of Plaintiffs’ Motion to
19 Seal and exhibits cited in Dkt. 672;

20 WHEREAS, pursuant to Civil Local Rule 79-5(e), the deadline for Google, as the
21 Designating Party to portions of Plaintiffs’ Motion to Seal (Dkt. 671), to establish that such
22 designated material is sealable, is Monday, August 15, 2022;

23 WHEREAS, Google has requested, and Plaintiffs do not oppose an extension of time of 14
24 days to Monday, August 29, 2022, which Google has represented will provide it with sufficient time
25 to submit its declaration in support of the designated materials in the filings (Dkt. 671);
26
27
28

Plaintiffs' Motion Concerning Withheld Privileged Documents

WHEREAS, on August 8, 2022, Plaintiffs filed their Administrative Motion for Relief re Google's Production of Documents Improperly Withheld as Privileged ("Plaintiffs' Motion Concerning Withheld Privileged Documents") (Dkt. 672);

WHEREAS, Google's current deadline to respond to Plaintiffs' Motion Concerning Withheld Privileged Documents is Friday, August 12, 2022;

WHEREAS, Google has requested, and Plaintiffs do not oppose an extension of time until Tuesday, August 16, 2022, for Google to respond to Plaintiffs' Motion Concerning Withheld Privileged Documents;

NOW THEREFORE, the Parties stipulate to extend the deadline by which:

1. Google shall respond to Plaintiffs' Motion Concerning Withheld Privileged Documents (Dkt. 672), to Tuesday, August 16, 2022;
2. Plaintiffs shall submit a Declaration in support of Google's Motion to Seal (Dkt. 660), to Friday, August 26, 2022; and
3. Google shall submit a Declaration in support of Plaintiffs' Motion to Seal (Dkt. 671), to Monday, August 29, 2022.

DATED: August 9, 2022

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

/s/ Jonathan Tse

Andrew H. Schapiro (admitted *pro hac vice*)
andrewschapiro@quinnemanuel.com
Teuta Fani (admitted *pro hac vice*)
teutafani@quinnemanuel.com
191 N. Wacker Drive, Suite 2700
Chicago, IL 60606
Tel: (312) 705-7400
Fax: (312) 705-7401

Stephen A. Broome (CA Bar No. 314605)
sb@quinnemanuel.com
Viola Trebicka (CA Bar No. 269526)
violatrebicka@quinnemanuel.com
Crystal Nix-Hines (Bar No. 326971)
crystalnixhines@quinnemanuel.com
Alyssa G. Olson (CA Bar No. 305705)

MORGAN & MORGAN COMPLEX
LITIGATION GROUP

/s/ Michael F. Ram

Michael F. Ram (CA Bar No. 104805)
mram@forthepeople.com
MORGAN & MORGAN, P.A.
711 Van Ness Avenue, Suite 500
San Francisco, CA 94102
Tel: (415) 358-6913

John A. Yanchunis (*pro hac vice*)
jyanchunis@forthepeople.com
Ryan J. McGee (*pro hac vice*)
rmcgee@forthepeople.com
MORGAN & MORGAN, P.A.
201 N Franklin Street, 7th Floor
Tampa, FL 33602
Tel: (813) 223-5505
Fax: (813) 222-4736

alyolson@quinnemanuel.com
865 S. Figueroa Street, 10th Floor
Los Angeles, CA 90017
Tel: (213) 443-3000
Fax: (213) 443-3100

Diane M. Doolittle (CA Bar No. 142046)
dianedoolittle@quinnemanuel.com
Sara Jenkins (CA Bar No. 230097)
sarajenkins@quinnemanuel.com
555 Twin Dolphin Drive, 5th Floor
Redwood Shores, CA 94065
Telephone: (650) 801-5000
Facsimile: (650) 801-5100

Jomaire A. Crawford (admitted *pro hac vice*)
jomairecrawford@quinnemanuel.com
51 Madison Avenue, 22nd Floor
New York, NY 10010
Telephone: (212) 849-7000
Facsimile: (212) 849-7100

Josef Ansorge (admitted *pro hac vice*)
josefansorge@quinnemanuel.com
1300 I Street NW, Suite 900
Carl Spilly (admitted *pro hac vice*)
carlspilly@quinnemanuel.com
Xi ("Tracy") Gao (CA Bar No. 326266)
tracygao@quinnemanuel.com
Washington D.C., 20005
Tel: (202) 538-8000
Fax: (202) 538-8100

Jonathan Tse (CA Bar No. 305468)
jonathantse@quinnemanuel.com
50 California Street, 22nd Floor
San Francisco, CA 94111
Tel: (415) 875-6600
Fax: (415) 875-6700

Attorneys for Defendant Google LLC

Mark C. Mao (CA Bar No. 236165)
mmao@bsfillp.com
Beko Reblitz-Richardson (CA Bar No. 238027)
brichardson@bsfillp.com
44 Montgomery Street, 41st Floor
San Francisco, CA 94104
Tel: (415) 293 6858
Fax: (415) 999 9695

James W. Lee (*pro hac vice*)
jlee@bsfillp.com
Rossana Baeza (*pro hac vice*)
rbaeza@bsfillp.com
100 SE 2nd Street, Suite 2800
Miami, FL 33130
Tel: (305) 539-8400
Fax: (305) 539-1304

William Christopher Carmody (*pro hac vice*)
bcarmody@susmangodfrey.com
Shawn J. Rabin (*pro hac vice*)
srabin@susmangodfrey.com
Steven Shepard (*pro hac vice*)
sshepard@susmangodfrey.com
Alexander P. Frawley (*pro hac vice*)
afrawley@susmangodfrey.com
SUSMAN GODFREY L.L.P.
1301 Avenue of the Americas, 32nd Floor
New York, NY 10019
Tel: (212) 336-8330

Amanda Bonn (CA Bar No. 270891)
abonn@susmangodfrey.com
SUSMAN GODFREY L.L.P.
1900 Avenue of the Stars, Suite 1400
Los Angeles, CA 90067
Tel: (310) 789-3100

Attorneys for Plaintiffs

ATTESTATION OF CONCURRENCE

I am the ECF user whose ID and password are being used to file this JOINT STIPULATION AND [PROPOSED] ORDER EXTENDING TIME FOR SUBMITTING DECLARATIONS IN SUPPORT OF SEALING (DKTS. 660, 671) AND RESPONDING TO PLAINTIFFS' ADMINISTRATIVE MOTION (DKT. 672). Pursuant to Civil L.R. 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in the filing of this document

Dated: August 9, 2022

By /s/ Michael F. Ram

Michael F. Ram

Counsel on behalf of Plaintiffs

[PROPOSED] ORDER

Pursuant to stipulation of the Parties, the Court hereby **ORDERS:**

The deadline for Google to respond to Plaintiffs' Motion for Relief re Google Documents Improperly Withheld as Privileged (Dkt. 672), shall be extended to August 16, 2022.

The deadline for Plaintiffs to submit a Declaration in support of Google's Administrative Motion to Consider Whether Another Party's Material Should Be Sealed (Dkt. 660), shall be extended to August 26, 2022.

The deadline for Google to submit a Declaration in support of Plaintiffs' Administrative Motion to Consider Whether Google's Material Should Be Sealed (Dkt. 671), shall be extended to August 29, 2022.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: _____

HON. SUSAN VAN KEULEN
United States Magistrate Judge